

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN THE MATTER OF:

DILIP JANA
Plaintiff,

v.

WALMART, INC.,
Defendant.

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Civil Action No. 4:24-cv-00698-SDJ-BD

**Affidavit of Authentication and Forensic Analysis of Exhibits 1, 2 (Complaint Dkt 13)
and 3 (July 18 Production)**

I, Dr. Dilip Jana, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

I. Background

1. I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and technical expertise.
2. **Identity.** I am the Plaintiff in Jana v. Walmart Inc., Case No. 4:24-cv-00698-SDJ-BD, proceeding pro se. I am over the age of 18, of sound mind, and competent to testify to the matters stated herein.

3. **Purpose.** I submit this affidavit to authenticate my forensic comparison of Wendy Bowman's email as it appears in three versions of the October 4, 2023 "termination recommendation" email (hereinafter "Exhibit 1," "Exhibit 2," and "Exhibit 3").
4. I hold a Ph.D. in Nuclear and Particle Physics and served as Director of Data Science at Walmart Inc. until October 19, 2023. My professional expertise includes data science, statistics, physics, digital forensics, and analytics. I was one of the authors for the experimental discovery of the Higgs boson popularly known as the "God Particle" in 2012 that led to the Physics Nobel prize in Physics awarded to theoretical Physicists who predicted the possible existence of the Higgs boson during 1963-1970.
5. My Walmart Supervisor Jonathan Sidhu said during Annual Review on or around February 10, 2023 *"The work that you steered for **Walmart forensics team**... the anomaly detection work, which in FY23 delivered finance-verified more than \$250 million in GMV through the end of January 2023."*. That work is now Patent Pending at the US Patent Office¹(US20240346287A1)

II. Authentication of Exhibits

6. I hereby authenticate the following exhibits as true and correct copies of the documents as I received them from Walmart during official proceedings:

- Exhibit 1 – OSHA Production (on or around February 22, 2024). This was produced by Walmart to OSHA during administrative proceedings, and I attached it in my September 2024 complaint. (Dkt 13 PageID: 298)

¹ <https://patents.google.com/patent/US20240346287A1/en>

- Exhibit 2 – OALJ Filing (June 14, 2024). This was filed by Walmart before the Office of Administrative Law Judges (DOL) as part of its responsive pleadings.(Dkt 13 PageID: 299). I redacted the name of a person in Exhibit 2 to protect privacy.
- Exhibit 3 – July 18, 2025 Production (WM-JANA_0000260.pdf). This was produced by Walmart in federal litigation on July 18, 2025, via paralegal transmission in a document dump.

7. Each of these documents purports to be the same October 4, 2023 “termination recommendation” email authored by Wendy Bowman (HR People Partner).

III. Forensic Analysis

Chain of Custody and Analysis Method

8. a. The PDF files analyzed in this declaration were obtained directly from Walmart’s July 18, 2025 production, which was transmitted in a compressed .zip archive.

b. To preserve the chain of custody, I did not alter, move, or unpack the archive. I accessed the PDFs in-memory only, using Python libraries that allow direct read-access without extraction.

(See **Exhibit A-1**)

c. At no point did I open, save, or overwrite the files. I did not modify metadata or content.

d. I computed hash values of the PDFs before and after the analysis session, confirming identical results.

A. Hash Values

9. SHA-256 cryptographic digests confirm Exhibits 1, 2, and 3 are distinct digital artifacts:

For Exhibit 1 and 2, Hash values were computed from Walmart's June 14, 2024 Response to OALJ PDF file, where Walmart attached Exhibit 1 and 2.

- **Exhibit 1:**

`cff3911b3e46377e200fc80b180b26ef87e1eccc2823849cd60cb177e107e05`

- **Exhibit 2:**

`b79cb25d35d417c9d6beb8041c0b328d6c0a17b590a11bfc047654dd6af20668`

- **Exhibit 3:**

`fcbb174ff6931732aae626c6e466542ba1c416243daf9cfbd4c289f310827795`

These distinct values prove the documents are not identical copies, but separate versions.

B. Metadata of Exhibit 3

10. Metadata extracted from Exhibit 3 reveals (See Exhibit A-2; with Code)

```
{  
  "producer": "Tesseract v5.2.0.20220712",  
  "creationDate": "D:20250716182801-05'00'"  
}
```

11. This confirms Exhibit 3 was created on July 16, 2025 at 6:28 PM CST, nearly 22 months after the purported October 4, 2023 email date.

12. Exhibit 3 was generated with Tesseract OCR software, not Microsoft Outlook or Adobe. It is therefore not a preserved contemporaneous email but an OCR-reconstructed fabrication created in 2025.

IV. Signature Block Comparison

13. a. I accessed each Exhibit in its native PDF format as produced or filed by Walmart.

b. I did not alter, edit, or manipulate the PDFs in any way.

c. I took screenshots of only the signature block at the bottom of the email in each Exhibit.

d. I placed these screenshots side-by-side in a single comparison image, adjusting only the zoom level so that the panels would display at a reasonably consistent scale.

e. No other modifications were made.

14. All three documents purport to be the same October 4, 2023 email. Outlook signature blocks, however, are static and do not change across reproductions.

15. The divergence across Exhibits 1–3, despite all being the same email, is independent proof of alteration and fabrication.

V. Conclusion

16. To a reasonable degree of forensic certainty:

- Exhibit 3 is fabricated, created on July 16, 2025 with OCR.
- Exhibits 1–3 are inconsistent versions of the same alleged October 4, 2023 email.
- The inconsistencies in signature blocks alone demonstrate tampering.

Declaration

I further declare that Walmart did not designate Exhibit 3 (WM-JANA_0000260.pdf) as “Confidential” in its July 18, 2025 production. Accordingly, Exhibit 3 is not subject to the Protective Order entered at Dkt. 67.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 28th day of August, 2025.

Respectfully Submitted,


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